

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Court File No. \_\_\_\_\_

Tracey R. Turner,

Plaintiff,

vs.

**DEFENDANTS' NOTICE**  
**FOR REMOVAL**

Roel Lubo, Owner/Driver, Individually and  
DBA Roel Lubo Trucking Service and  
Bison Transport, Inc., Registrant,

Defendant.

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Petitioners\Defendants Roel Lubo, Owner/Driver, individually and DBA Roel Lubo Trucking Service and Bison Transport, Inc., respectfully show and allege the following in support of their Petitions for Removal.

1. Petitioners are the Defendants in an action commenced against them in Hennepin County District Court entitled Tracey R. Turner v. Roel Lubo, Owner/Driver, Individually and DBA Roel Lubo Trucking Service and Bison Transport, Inc. A true and correct copy of the Summons and Complaint served upon petitioner is attached as Exhibit "A". No further proceedings have taken place in the state action.

2. Plaintiffs is and was at all relevant times a citizen who resides in the City of International Falls, County of Koochiching and the State of Minnesota.

3. Petitioner\Defendant Roel Lubo, Owner/Driver, individually and DBA Roel Lubo Trucking Service was and at all relevant times a citizen residing in Winnipeg, Manitoba, in Canada.

4. Petitioner\Defendant Bison Transport, Inc. was a citizen and a corporation who resides and with its principal place of business in Winnipeg, Manitoba, in Canada.

5. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

6. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

7. The Summons and Complaint in the state action was served on Defendants on or about August 22, 2018 and Petitioners\Defendants have filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioners\Defendants pray that the state action pending against them be removed to this Court.

Dated: September 4, 2018.

Lind, Jensen, Sullivan & Peterson  
A Professional Association

s/ Brian A. Wood

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